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November 27, 2024

VIA CM/ECF

The Honorable José R. Almonte, U.S.M.J
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
Court Room PO 9
50 Walnut Street
Newark, New Jersey 07101

Re: LORENZO v. THE BOROUGH OF PALISADES PARK et al.
Civil Action No.: 2:23-cv-21849-CCC-JRA

ASHLEY V. THE BOROUGH OF PALISADES PARK, et al.
Civil Action No.: 22-cv-6285-CCC

Dear Judge Almonte:

This office represents plaintiffs David J. Lorenzo and Austin Ashley in the above referenced matters which have been consolidated for discovery purposes. Defendants, the Borough of Palisades Park, Chong Paul Kim, and Suk "John" Min are represented by R. Scott Fahrney, Jr., Esq. Defendants Stephanie Jang and Jae Park are represented by Roshan Shah, Esq. Please accept the following joint letter on behalf of all parties summarizing the status of these cases as directed by the Court (ECF No. 47)

All parties have propounded written discovery demands.

Plaintiffs have supplied answers to interrogatories propounded by defendants. Plaintiffs have identified and complied all documents responsive to defendants' document demands and are completing a final review of their production for relevance and privilege. Plaintiffs anticipate serving all responsive documents no later than December 2, 2024.

Plaintiffs have retained and disclosed Kristin Kucsma, M.A. and Kenneth T. Betz, M.B.A, M.A of Sobel Tinari Economics Group as experts they expect will provide reports and testify at trial. They are preparing their reports, and plaintiffs expect to provide them in early 2025.

Defendants have not responded to plaintiff's interrogatories or requests for production of documents. Mr. Shah anticipates providing his clients' discovery responses no later than December 16, 2024. Mr. Fahrney anticipates providing his clients response no later than December 31, 2024.

Based on the foregoing, the parties respectfully request that the scheduling order in this case be revised with the following dates for completion of discovery.

1. Responses to paper discovery by 12/31/2024.
2. Depositions completed by 3/31/2025.
3. Plaintiffs' expert reports by 5/16/2025.
4. Defendants' expert reports by 7/31/2025.
5. Expert depositions by 10/15/2025.

The parties look forward to discussing the status of these matters during the upcoming telephone conference on December 4, 2024.

Respectfully,

s/ Leonard Seaman
LEONARD E. SEAMAN

LES/me

cc: All counsel (via CM/ECF)
client (via e-mail)